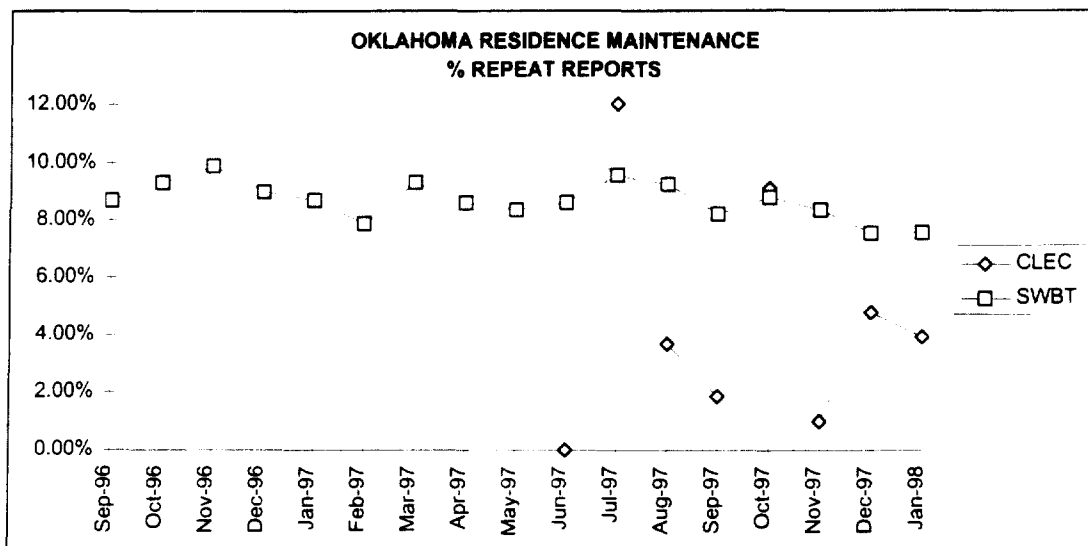


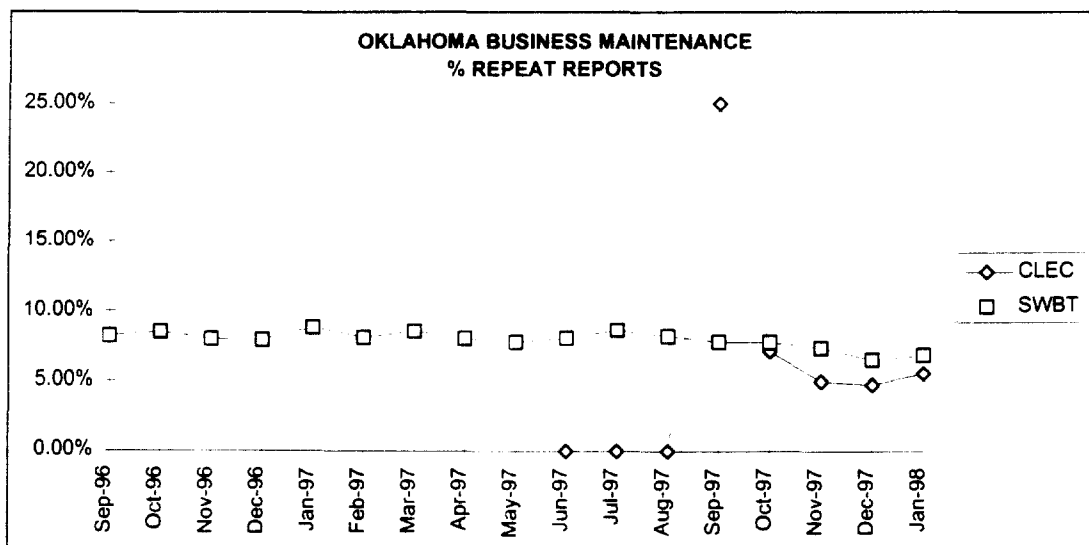
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85. The OOS < 24 hour measurement is not applicable for design circuits. Design circuits are given a higher priority than POTS and are prioritized by type of service. Due to the shorter clearing times, this measurement is not required. Therefore, for design services and UNEs analogous to SWBT design services no OOS < 24 hours measurement will be reported. The CLEC will be able to assess non-discriminatory treatment from the MTTR measurement.
86. **POTS Percent Repeat Reports** measures the percent of customer trouble reports received within 10 calendar days of a previous customer report that were not caused by CPE or inside wiring, excluding subsequent and all disposition code “13” excludable reports. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT retail.
87. The charts below show a comparison between the aggregate CLEC data and SWBT data for POTS percent repeat reports, broken down by business and residence.

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This chart indicates that the CLECs experience a lower residence percent repeat reports than SWBT. The variation in the data is as a result of small sample sizes even though the sample is large enough in September through January to provide valid results. The standard deviation was between 0 and 1 in October, between -1 and -3 in September, December and January and exceeded -3 in November. As the sample increases the variation in the CLEC data would be expected to decrease.



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There is an insufficient number of business trouble reports for the aggregate of all CLEC data to obtain a statistically valid comparison for the business percent repeat report measurement.

88. **Design Services Percent Repeat Reports** measures the percent of network customer trouble reports received within 30 calendar days of a previous customer report. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL) and ISDN.
89. **UNE Percent Repeat Reports** measures the percent of network customer trouble reports received within 30 calendar days of a previous customer report. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT by loop type [2-Wire Analog 8dB Loop, BRI (2-Wire Digital Loop), and PRI (DS1 Loop)], switch port (Analog, Analog DID, BRI and PRI) and unbundled dedicated transport .
90. **The Local Operations Center (LOC) Average Speed Of Answer** measures the average time a customer is in queue. The time begins when the customer enters the queue and ends when the call is answered by a SWBT representative. This measurement will be reported for all calls to the LOC for all CLECs and SWBT repair bureau.

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BILLING

91. Billing involves the exchange of information necessary for CLECs to bill their customers, to process the end user's claims and adjustments and to view SWBT's bill for services provided to the CLEC. SWBT provides CLECs with a choice of four options for obtaining electronic access to billing information: Bill Plus TM, EDI, Customer Network Administration (CNA), and Usage Extract Feed (EMR).
92. SWBT recognizes the importance of the timeliness, accuracy and completeness of billing to the CLECs. Currently SWBT does not measure these items for its customers. However, SWBT is in the process of developing meaningful measures to address the timeliness, accuracy, and completeness of the CLEC's and SWBT's customer bills.
93. SWBT performs three audits to ensure the accuracy of the bills that are rendered to its customers: CRIS, CABS and toll usage. In addition, SWBT has developed a test order process to ensure the accuracy of the CRIS non-recurring charges.

CRIS BILL AUDIT

94. The purpose of the Bill Audit position in Billing Operations is to insure that the CRIS system is functioning properly, updates to the system are applied accurately, and that bills are issued to residence and business customers on a timely and accurate basis. As changes are made to CRIS, it is critical that these changes be

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verified prior to releasing bills to customers. It is the responsibility of the Bill Audit function to determine if bills are to be released to the customers.

95. In order to validate the bills, a sample of specific services requiring different system functions are used as criteria to develop preview account files. The sample is not a statistical sample; however, it does reflect an accurate representation of customer products and services. This sample is used to verify billing system functions. Therefore, any extrapolation of data from errors found during audit can not be applied to determine the number of bills in error.
96. The preview bill file creates a copy of the "Live" bill during the bill creation process. Mechanically the current billing amounts are compared to the previous month's billing amounts. If nothing has changed on the accounts since the previous bill period, the totals should be the same. Using the mechanized printouts and other manual reviews, all accounts which reflect a discrepancy are investigated to determine the cause of the difference. This may require looking at service orders that posted to the accounts or investigating any regulatory, tax or rate change which may have taken affect. Should a system wide error be detected that would require the rerunning of the bills to avoid issuing inaccurate bills, the current billing processes allow for that capability. If a system error is not widespread, the error is referred for program correction.

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97. The purpose of the Bill Audit is to review and recalculate each service billed for each of the seven individual processing centers in the five states. Wholesale accounts are included in each processing center's verification every billing period. The discount table is used to ensure that the correct discount is applied.
98. Currently, the Bill Audit unit maintains a preview file that includes at least one (1) CLEC CBA and one (1) CLEC end user account per bill period, per site when available. This equates to 210 potential CLEC bills audited per month. In addition to this process, the Bill Audit Unit also attempts to verify that the discount applied to every new CLEC CBA is correct when it first bills.
99. SWBT has elected to use the same billing process for wholesale as is used for retail. Therefore, the audit procedures designed for retail billing are applicable to wholesale billing as well.

CABS BILL AUDIT

100. CABS Bill Audit is performed to ensure that the CABS programs process each billing function correctly. Bills are chosen on based different billing functions, and usage types, (Feature Groups). The includes each different Feature Group for Switched Access, Non-Switched Access & Special Access. Switched and Special Access both have UNE included in their Bill Audit functions.

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101. The Usage billing process is mechanically validated by our Production Code Test (PCT) process for most usage types, and we manually verify any other usage type not included in the PCT process. The PCT process includes processing from AMA through CABS billing using a test-bed of actual usage and creates billed data that is compared to expected result data. Root cause analysis is performed on all non-compares.
102. Other Charges and Credits, (OC&C), generated by service order activity is reviewed daily prior to bills being created. During the Bill Audit process we verify that the amount expected for OC&C amount appears on the bill.
103. Late payment charges (LPC), Alternate Billing Media (ABM), surcharges and taxes are additional manual verifications performed on all types of services.

TOLL/USAGE BILL AUDIT

104. The TOLL AUDIT is performed to ensure that TOLL, and associated charges are correct on Residence and Business customer bills. The focus of the audit is to manually or mechanically review every Toll service we provide to Residence and Business customers each billing period.
105. The Customer Information Data Base (CIDB) is utilized for the account selection. CIDB program is used to find accounts and provides information on which accounts have the requested services. Whenever possible, accounts with multiple

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items are tested to maximize efficiency. Once accounts are selected they are entered into a Preview Bill File. The Preview Bill File contains a copy of each selected account to be audited. The Preview Bill File is continually reviewed and additions or deletions made.

106. The purpose of the Bill Audit is to review and recalculate each service billed for each of the seven individual processing centers in the five states. Wholesale accounts are included in each processing center's verification every billing period. The discount table is used to ensure that the correct discount is applied.
107. Any discrepancies found must have root cause analysis done before bills are released to be mailed on the six workday of the billing period.

NON-RECURRING CHARGE VALIDATION

108. SWBT utilizes the daily test order process to validate recurring and non-recurring charges for products and services billed via service orders. This process is embedded in the CRIS billing system programs and cycle flow and has been part of the CRIS program cycle for over twenty years.
109. Before any live service orders are processed by daily SWBT CRIS billing programs, a test order file is processed through the live service order rating programs. The test order file format is the same as live service orders, with the exception of 3 additional entries. These entries contain expected recurring, non-

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recurring and total charges from the order. There are 7 separate billing databases for SWBT, thus 7 separate test order files. Texas has 3 databases, with 1 database each for the other states. A total of 1469 test orders reside on these files with 219 being CLEC orders.

110. Each test order file is maintained by the rate table update groups located in Dallas in the Billing Operations organization. Personnel in the rate groups calculate the rates based on applicable tariffs, contracts or other approved rate documentation. Each file is a representative sample of a variety of activity for existing products and services billed by SWBT. Each file is modified on a regular basis to include new products, services and CLEC's, and any state specific changes.
111. The live service order rating programs calculate and apply rates to the test orders in the same way they rate live service orders. This encompasses using the same programs and file sources, including the CRIS rate tables and discount matrices for CLECs. When the programs have rated the test orders, a step in the program compares the program calculations to the 3 entries on each test order. Any difference causes the program to halt. Processing stops immediately. A data center manager contacts the appropriate Billing Operations manager to investigate the difference. The cycle is not allowed to continue until the difference is resolved.

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BILLING MEASUREMENTS

112. There are three categories of billing performance measurements; timeliness, accuracy and completeness. These billing measurement categories can be applied when assessing SWBT's performance in the billing functions of daily usage feed, non-recurring charges and wholesale bill.
113. In the following paragraphs I describe the four billing performance measurements SWBT has agreed to provide CLECs based on negotiations with CLECs, FCC rulings and discussions with the Department of Justice as they relate to the billing categories and billing functions. SWBT is willing to negotiate additional measurements on a case by case basis with the CLECs.

BILLING ACCURACY

114. SWBT will provide a measurement, percent of billing records transmitted correctly, that will be provided for accuracy of the daily usage feed. In addition a Toll/Usage audit, ¶s 105-107, is done each billing period to verify that toll and associated charges are correct.
115. **Percent Of Billing Records Transmitted Correctly** measures the percent of billing records transmitted correctly on the usage extract feed. This measurement is reported for individual CLECs and for all CLECs in the aggregate.

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116. No separate billing measurement will be provided for accuracy of non-recurring charges. The same billing process that is used for the CLECs is used for SWBT. As described in ¶s 108-111, SWBT tests daily the accuracy of SWBT and CLEC non-recurring charges. If a problem is found, the billing process is stopped immediately and the problem corrected. SWBT believes that this process ensures the accuracy of the non-recurring charges and therefore no measurement is required.
117. SWBT will provide two measurements to assess the accuracy of the wholesale bill; the results of the CLEC bill audit and the percent of accurate and complete formatted mechanized bills.
118. SWBT believes that a measurement of accuracy of wholesale bills is not required since it is the same billing process used for itself and due to the audit process described in ¶s 94-103. This in itself assures parity. However, SWBT will provide on a monthly basis the results of the audit of CLEC accounts. Since the sample was designed to verify billing system functions, it can not be used to predict the percent of overall billing errors.
119. **Percent of Accurate and Complete Formatted Mechanized Bills** measures the percentage of accurate and complete formatted mechanized bills via EDI. This measurement is reported for individual CLECs and all for CLECs in the aggregate.

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BILLING TIMELINESS

120. SWBT will provide a measurement of the timeliness of the daily usage feed. This measurement is still under investigation. However, the purpose of the measurement will be to measure the length of time from message creation to the time it is made available to the CLECs.
121. No separate measurement is required for non-recurring charges since they are included in the wholesale bill.
122. SWBT will provide a **Billing timeliness** measurement that measures the timeliness that bills are released by bill type (i.e. Bill Plus, EDI, BDT). The bills must be sent out by midnight of the sixth workday after the end of the bill period to be considered on time. Since paper bills are handled using the same process that SWBT uses for paper distribution, no measurement for paper bills is necessary. This measurement is reported for individual CLECs, and for all CLECs in the aggregate.

BILLING COMPLETENESS

123. The same process that is used to collect the daily usage feed data for the CLECs is used for SWBT. Therefore, no measurement is required.
124. No separate measurement is required for non-recurring charges.

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125. SWBT will provide a **Billing Completeness** measurement that measures the percent of service orders that bill on the first applicable bill period. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT.

OPERATOR SERVICES AND DIRECTORY ASSISTANCE

126. Directory Assistance (DA) and Operator Services (OS) traffic for CLECs providing resold services will be carried over the same trunk groups as the SWBT OS and DA traffic. For facility based providers that have their own switch, the CLEC is responsible for the sizing of their OS and DA trunk groups.
127. In both cases, calls will be put into queue on a first come first served basis. Operators will receive and process calls from CLECs and SWBT based on a first in first out basis. When a call is received at the operator services or directory services position, operators will identify the CLEC by an eight field identifier which appears on their screen which is translated from the Alternate Exchange Carrier Name (AECN) code which is passed with the call. This enables the operators to correctly brand the call (see Keener Affidavit).
128. Accordingly calls received by the operators will be handled in a nondiscriminatory basis when branded OS/DA services are provided.

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129. SWBT measures the average speed of answer for operator services and directory assistance. Since the CLEC and SWBT calls will be processed by the same operators and handled in the same manner, there is no practical way to report the average speed of answer for CLECs alone. SWBT will make available to the CLECs the combined average speed of answer and grade of service for both operator services and directory assistance.

OPERATOR SERVICES AND DIRECTORY ASSISTANCE MEASUREMENTS

130. In the following paragraphs I describe the four operator services and directory assistance performance measurements SWBT has agreed to provide CLECs based on negotiations with CLECs, FCC rulings and discussions with the Department of Justice. SWBT is willing to negotiate additional measurements on a case by case basis with the CLECs.
131. **Directory Assistance Grade Of Service** measures the percent of directory assistance calls answered < 1.5, < 2.5, > 7.5, > 10.0, > 15.0 , > 20.0, and > 25.0 seconds.
132. **Directory Assistance Average Speed Of Answer** measures the average time a customer is in queue. The time begins when the customer enters the queue and ends when the call is answered by a SWBT representative.

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133. **Operator Services Grade Of Service** measures the percent of operator services calls answered < 1.5, < 2.5, > 7.5, > 10.0, > 15.0 , > 20.0, and > 25.0 seconds.
134. **Operator Services Average Speed Of Answer** measures the average time a customer is in queue. The time begins when the customer enters the queue and ends when the call is answered by a SWBT representative.

NETWORK PERFORMANCE

135. SWBT does not regularly measure transmission levels on its retail customer lines unless a customer trouble is reported. All customer lines are installed to adhere to specific transmission requirements to meet the customers use (i.e. voice, data). If a transmission problem is detectable by the customer, in all likelihood a trouble report would be issued. This would be reflected in the report rate. This is the same approach that will be applied to the CLECs.
136. SWBT tracks % dial tone delay on a wire center basis. If the % dial tone delay is excessive, this condition necessarily affects the entire switch and impacts CLECs and SWBT in the same way.
137. SWBT will provide the CLECs with a report on major network events, such as major cable cuts or switch outages, on a combined basis and notify the CLECs when a major network event occurs.

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INTERCONNECTION TRUNKS

138. In 1990, the Exchange Carriers Standards Association Committee T1 established blocking levels associated with end office to tandem common transport trunk groups and end office or tandem to IXC POP trunk groups. It was agreed that the overall blocking objective between the end office serving an IXC customer and the IXC POP was 1%. If the connection was routed through the tandem, the common transport trunk group would be engineered to .5% blockage and the tandem to POP would be engineered to .5% blockage for an overall blockage of 1%. In 1993, in response to concerns from the IXCs, SWBT changed its policy to engineer common transport trunk groups from its end offices to its tandems to .25% blockage.

IXC POP ----.5% ---- SWBT Tandem ----.25% ---- SWBT End Office

139. As part of its proposed CLEC contractual agreements, SWBT's proposed language in the Interconnection Trunking Appendix incorporates an overall blocking objective of 2% for calls between a SWBT customer and a CLEC customer. That would be 1% blockage on end office to tandem common transport trunk groups and 1% blockage on tandem to CLEC common transport trunk groups. However, since calls to the CLEC via the tandem will be transported over the same common transport trunk group as described above, the blocking objective would be .25% for the common transport trunk group.

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140. The trunk groups between SWBT end offices are designed for 2% blocking.

CLEC End Office --- 1% --- SWBT Tandem --- .25% --- SWBT End Office

SWBT End Office ----- 2% ----- SWBT End Office

141. Thus, CLEC calls routed to the SWBT end offices via the tandem are designed to experience only 1.25% blockage, while calls routed directly between SWBT end offices can experience 2% blockage.

142. SWBT interconnects with CLEC switches using one way or two way trunks. For one way trunks, SWBT typically has “control” over the outgoing trunk group from its switch and the CLEC has control for those groups incoming to SWBT switches. For two way groups, the CLEC and SWBT have joint responsibility for provisioning the trunk group. For those groups over which SWBT has “control”, comparative measurements will be provided to SWBT to SWBT trunk groups with analogous blocking design criteria. For those groups over which the CLEC has sole or joint “control”, no comparative measurements for percent blocking will be provided.

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INTERCONNECTION TRUNK MEASUREMENTS

143. In the following paragraphs I describe the three interconnection trunk performance measurements SWBT has agreed to provide CLECs based on negotiations with CLECs, FCC rulings and discussions with the Department of Justice. SWBT is willing to negotiate additional measurements on a case by case basis with the CLECs.
144. **Percent Trunk Blockage** measures the percent of calls blocked on outgoing traffic from the SWBT switch to the CLEC switch. This measurement will be provided separately for SWBT end office to CLEC end office and SWBT tandem to CLEC end office trunk groups.
145. This measurement will be reported for individual CLECs, for all CLECs in the aggregate and for SWBT with respect to trunk groups that are “controlled” by SWBT. For trunk group that are not “controlled” by SWBT, this measurement is not applicable.
146. SWBT will also provide a measurement of the percent of SWBT tandem trunk groups that exceed 2% blocking and the average blocking for those trunk groups.
147. **Percent Missed Due Dates** measures the percent trunk order due dates missed on interconnection trunks. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT.

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148. **Average Trunk Restoral Interval** measures the average time to repair interconnection trunks. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT.

INTERIM NUMBER PORTABILITY (INP) MEASUREMENTS

149. In the following paragraphs I describe the four INP performance measurements SWBT has agreed to provide CLECs based on negotiations with CLECs, FCC rulings and discussions with the Department of Justice. SWBT is willing to negotiate additional measurements on a case by case basis with the CLECs.
150. SWBT will provide measurements to reflect the provisioning of INP. Maintenance issues will not be broken out for INP, but will be reported together in the maintenance measures discussed in ¶s 67 through 90.
151. **Percent Installations Completed Within “x” Business Days** measures the percent installations completed within “x” business days based on the number of INP requests per order as defined in ¶ 50, excluding delayed installations caused by the customer and customer requested due dates greater than “x” business days. This measurement is reported for individual CLECs and for all CLECs in the aggregate.
152. **Average INP Installation Interval** measures the average business days from application date to completion date for INP orders, excluding customer requested

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due dates greater than “x” business days as defined in ¶ 50. This measurement is reported for individual CLECs and for all CLECs in the aggregate.

153. **Percent INP I-Reports Within 30 Days** measures the percent of INP N, T and C orders that receive a network customer trouble report not caused by CPE or wiring within 30 calendar days of service order completion, excluding subsequent reports and all disposition code “13” reports (excludable reports). This measurement is reported for individual CLECs and for all CLECs in the aggregate.
154. **Percent Missed Due Dates** measures the percent of INP N, T and C orders where installations are not completed by the negotiated due date, excluding customer caused misses. This measurement is reported for individual CLECs and for all CLECs in the aggregate.

911 DATABASE

155. The 911 database update process ensures that both the CLEC’s updates are handled in parity with SWBT’s updates. For pure resellers, updates are provided within 24 hours of the SORD file updates, just exactly as SWBT 9-1-1 updates are provided. Facility based providers use the PS911 approach that provides instant updates to the FR/DBMS (the 911 data management system) and immediate feedback via a statistical report of records processed on the file and errors that occurred. A separate error file is also immediately available. The Automatic Location Identification (ALI) data base, the data base that sends the

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address information to the Public Safety Answering Point (PSAP), is updated 5 times a day in the Missouri , Oklahoma, Kansas and Arkansas (MOKA) region, and 6 times a day in Texas. The updates are not instantaneous, but are within 24 hours period. The updates to the ALI, process all changes since the last ALI update process was executed without regard to record ownership. In other words, SWBT and CLEC records will update the ALI system at the same time via the ALI updates. The selective routers are updated 2 to 4 times a day in Texas (depending on the region, i.e. Houston router gets updated 4 times, Dallas get updated 2 times). The selective routers are updated once a day in the MOKA region. Based on clean input (no errors) the records would update the selective routers and the ALI data base within 24 hours of receipt of the update file.

156. Errors resulting from this process in the 9-1-1 Database Management System are handled by the SWB 9-1-1 Data Integrity Unit (DIU). Errors are received when the file has completed processing. Employees in the DIU are responsible for investigating each error and resolving it.
157. The DIU employee can not determine if an account is a Resold Account until he/she begins the investigation on the error. Only when the account is accessed in the SWB CRIS or SORD system can they determine it is Resold. SWB does not have access to the billing system of the CLEC and therefore cannot continue the investigation process. Procedures have been agreed upon between the DIU and

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the LSC, that when it is necessary to contact the CLEC to get additional information to clear an error, the DIU will call the LSC and refer the error.

158. The LSC then contacts the CLEC to get the necessary information to correct the record so it can post to the 9-1-1 Database. The LSC is responsible for issuing a correcting order that will flow to 9-1-1 and post. The LSC then notifies the DIU of the disposition.
159. The DIU will then follow-up to be sure the correcting order posts and at that time delete the original error, if the error can be corrected without an order being issued this information is given to the DIU and the error is manually corrected.
160. Currently, SWBT is not able to mechanically measure the length of time it takes to clear an error once it is created in the system. SWBT strives to meet the Recommended Standards set by the National Emergency Number Association (NENA) and recently standards were produced with regard to Data Accuracy. This is one of the measurements NENA recommends. SWB is currently working with Lucent Technology to develop the requirements for this enhancement and should have this measurement in place at the end of 3rd quarter 1998.

CONCLUSION

161. There is currently data available on 43 of the performance measurements discussed above. From the data provided, including those where the sample was

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insufficient, SWBT is providing equivalent or better service in 38 of the measurements and 5 reflect SWBT is receiving better service. In regards to the 5 that appear not to be in parity, SWBT is currently breaking the data down further to identify where the problem lies.

162. As the summary of results in ¶ 161 show, SWBT is committed to ensure that parity is maintained between its own retail operations and its service to CLECs. The most important performance measurements are those that have a direct impact on the end user customer service: 1) was the service delivered when it was promised, and 2) was it done right the first time. These are the measurements which SWBT has agreed to provide.

AFFIDAVIT OF GEORGE R. ELIZONDO

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FOR REVIEW IN ACCORDANCE WITH THE TERMS OF THE
PROPRIETARY AGREEMENT ORDERED IN THIS CAUSE.**